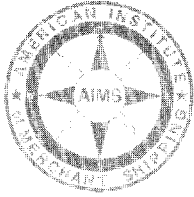


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***American Institute of Merchant Shipping***

**1000 16th Street, N.W., Suite 511, Washington, D.C. 20036-5705  
Telephone (202) 775-4399 FAX (202) 659-3795**

**Before the  
Federal Communications Commission**

**RECEIVED**

We agree to the change in the EPIRB requirement that it be a satellite EPIRB versus a 121.5. The satellite EPIRB will be required after July 1993 on ships making SOLAS voyages so a requirement for domestic voyages is appropriate.

We agree that GMDSS be identified as meeting the general exemption requirements. The GMDSS is an operational system and we are advised by the International Chamber of Shipping that over 50% of the world's ocean-going fleet is now utilizing the GMDSS equipment. Two additional benefits, extending beyond the use of a safer, more effective system, are that manufacturers will be encouraged to submit their equipment for GMDSS type approval and individuals will be encouraged to sit for GMDSS licenses.

We have some specific comments on particular paragraphs of the proposed rule as follows:

Paragraph (b)(1):

We can agree with the limitation to domestic voyages, although we point out that, from an equipment and personnel standpoint, compliance with GMDSS would be appropriate for any voyage within 150 miles from land, whether domestic or international.


Recognizing that the language in the second sentence is not exclusive, we point out that U.S. ships on domestic voyages, restricted as such by the Jones Act, call at Puerto Armuelles and Chiriqui Grande, Panama which are the Pacific and Caribbean ports of the Trans-Panama Pipeline. Cargo moved through this pipeline remains Jones Act cargo and the ships remain on a domestic voyage regardless of the pipeline activity. Vessels calling at these ports meet the domestic voyage criteria. Similarly, vessels "in transit" on the Canal may make entry into Colon or Balboa for the purpose of bunkering. These vessels retain their domestic trade identification and will meet the criteria for the proposed exemption. Most of the vessels involved carry SOLAS certificates as a convenience to the owner who is then able to make an international voyage if necessary; SOLAS does not cover the domestic voyage. While the proposed language does not exclude these above circumstances, we request that you consider language which will specifically identify them.

Paragraph (b)(4)(x):

Add " . . . in accordance with Section 80.305(b) when navigated."

We agree with the language proposed in the other paragraphs and look forward with interest to reviewing other comments. If you would like any further information on our suggestions, please feel free to call us.

Sincerely,

  
Joseph J. Cox  
Vice President